

TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 96OPWE162
SIGNIFICANT MODIFICATION
to be issued to:

Metal Container Corporation
Weld County
Source ID 1230134

Matthew S. Burgett
January 2006

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the modification of the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit modification by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the original application submittal of November 17, 2005, as well as correspondence and telephone contacts with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. SOURCE DESCRIPTION:

Metal Container Corporation manufactures the bodies of 2 piece-aluminum beverage cans. The plant has two process lines (Lines No. 1 and 2), which have emissions from natural gas fired ovens/boilers, can forming equipment, surface coating operations and miscellaneous combustion sources. Each process line consists of front-end and back-end operations. The front-end includes cupping and bodymaking units, which form the cans from aluminum coil, followed by washers which clean the can bodies for

decorating. The back-end comprises the surface coating operations. A portion of the cans made are basecoated and cured in a natural gas-fired oven and then routed to decorators where the exterior of the can is printed with high solid inks. Cans that are not basecoated are routed directly to the decorators and cured in natural gas-fired ovens. The cans are then roll-coated with a water-based overvarnish and rim varnish before being cured in natural gas-fired ovens. The inside of the can is sprayed with a water-based coating and cured in natural gas-fired ovens. Following the coating operations, the cans are necked, reformed, tested, and palletized prior to warehousing for shipment. The boilers supply low pressure hot water for the washers. The miscellaneous combustion sources supply building heat.

The facility is located southeast of Windsor on the north side of County Road 66 in the Windsor Industrial Park, Weld County. The area in which the plant operates is designated as attainment for all criteria pollutants. There is one affected state within 50 miles of the plant: Wyoming. The following Federal Class I designated areas are within 100 kilometers of the plant: Rawah Wilderness Area and Rocky Mountain National Park.

Based on the information provided by the applicant, it is not categorized as a major stationary source (no single criteria pollutant emissions with a Potential to Emit of greater than 250 TPY as of the issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part D, Section VI).

This facility is located in the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

Emissions

The summary of emissions that was presented in the Technical Review Document (TRD) for the renewal permit issuance has been modified to update the potential to emit based on revisions to permitted emission limits, and to update actual emissions. Emissions (in tons per year) at the facility are as follows:

Pollutant	Potential to Emit (TPY)	Actual Emissions (TPY)
PM	11.0	11.0
PM ₁₀	11.0	11.0
NO _x	82.2	82.2
CO	46.0	46.0
VOC	245.0	245.0
HAPS	9.9 (any single HAP) 20 total	9.67 (Glycol Ethers) 12.77

The PTE shown above is based on permit limitations. Actual emissions are

based on the most recent APENs submitted to the Division.

III. MODIFICATIONS:

Source Requested Modifications

Metal Container submitted an application to include Federally enforceable Hazardous Air Pollutant (HAP) limits in the Operating Permit to avoid future Maximum Achievable Control Technology (MACT) requirements. Metal Container also requested approval to allow the installation of additional equipment: one new bodymaker and one new inside spray machine.

Minor Modification

The Division processed the additional equipment request as a minor modification to the Operating Permit. The addition of the new equipment did not increase emissions by more than 40 tons per year (TPY) of VOC. The facility-wide VOC limit actually will remain unchanged at 245 TPY. The PTE of the inside spray machine was reported as 11.12 TPY VOC by Metal Container. The bodymaker does not have any emissions directly associated with it. It is a piece of metal working equipment which uses pressure to shape the cans. The only real change needed in the permit was to include the new equipment in the equipment description (Section I, Condition 6).

Metal Container was sent an application completeness letter for the minor modification request on January 4, 2006. Metal Container was allowed to make the requested changes upon the application completeness date of January 3, 2006. These minor modification changes are now included in the permit.

Significant Modification

The Division processed the request to add HAP limits to the permit as a significant modification. This request requires public comment to make the HAP limits Federally enforceable. These limits were requested to avoid MACT requirements which will become effective in the near future. Specifically, Metal Container wishes to avoid the MACT for boilers (DDDD) and metal cans (KKKK). The compliance date for DDDD is 9/13/2007 and KKKK is 11/13/2006. Both MACT requirements only apply to sources that are major for HAPs. The new synthetic minor HAP limits will allow Metal Container to avoid these MACT requirements.

Facility-wide HAP limits have been added to Section II, Condition 3.1, 1.1 and 6.2. Metal Container requested HAP limits of 10 TPY for any single HAP and 25 TPY for total HAPs. These are right at the major source threshold. The Division does not allow limits that close to the major source threshold. The Division will allow Metal Container to have a limit of 9.9 TPY for any single HAP and 20 TPY for total HAPs. Metal Container will be required to track HAP emissions from insignificant activities. The HAP emissions from insignificant activities must be less than 0.1 TPY to keep Metal Container Corporation below the major source threshold. Thus the Division will require

Metal Container to track HAP emissions from insignificant activities and add them to the facility-wide HAP calculations. This new requirement appears in Section II, Condition 5.2. HAP emissions must be calculated on a rolling 12 month basis and include emissions from both significant and insignificant activities.

The references to MACT requirements have been removed from the permit (Section II, Condition 1.5 & 3.10).

Metal Container has also requested a modification to the aluminum scrap handling limit in Condition 4.2. The limit will increase from 4500 ton/yr to 5000 ton/yr. However, the facility-wide PM & PM₁₀ emission limits do not need to be modified according to Metal Container.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal. These changes are as follows:

Information Page

- Corrected the expiration date to July 1, 2008
- Corrected the plant site location address
- Updated the responsible official and facility contact person based on Form 2000-100

Section I – General Activities and Summary

- Added General Permit Condition 3.g to the list of State-only enforceable conditions
- Minor language changes were made to Condition 3 to more appropriately reflect the status of the source with respect to PSD.

Section II – Specific Permit Terms

- The opacity requirements have been modified to the language found in Regulation No. 1 (see Conditions 1.4, 2.3, 3.7, 4.5 & 6.3)
- The fugitive emissions control techniques and work practice standards have been removed from the permit. These do not apply statewide, only in the 1-hr ozone attainment/maintenance area.
- The permit language has been slightly modified in Condition 1.4 to make it clear that natural gas is the only fuel used in the equipment covered by Condition 1.
- The Division has removed the requirement to track can production and determine daily emissions in Condition 3.1. There was no basis for this requirement.

Section III – Permit Shield

- The citation in the permit shield was corrected.

Section IV – General Permit Conditions

- The definition of prompt was changed in Condition 21.
- The language in Condition 22.d was slightly modified.

Appendices

- Appendix B & C have been updated to the current version (6/1/06). The requirement to determine if data was continuous has been removed from Appendix C.
- The table in Appendix F has been updated with the requested modifications.